

UNITED STATES DISTRICT COURT

for the
District of South CarolinaIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)INFORMATION ASSOCIATED WITH FACEBOOK
USER ID 100055326781270 THAT IS STORED AT
PREMISES CONTROLLED BY FACEBOOK INC.

Case No. 2:22-cr-731

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
See Attachment Alocated in the _____ Judicial _____ District of _____ South Carolina _____, there is now concealed (identify the person or describe the property to be seized):
See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC 1591(a)(1)	Sex trafficking of a minor
18 USC 1594 (c)	Conspiracy to sex traffic a minor
18 USC 2251(a)	Production of child pornography

The application is based on these facts:

See Attached Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



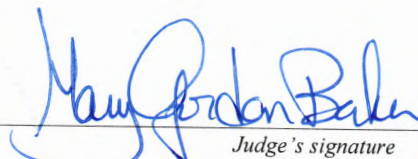
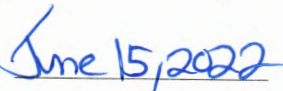
Applicant's signature

Kenneth D. Hawsey, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:



Judge's signature

City and state: Charleston, South Carolina

Mary Gordon Baker, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
FACEBOOK USER ID **100055326781270**
THAT IS STORED AT PREMISES
CONTROLLED BY FACEBOOK INC.

Case No. 2:22-cr-731

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, **Kenneth D. Hawsey**, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with Facebook account associated with **JUVENILE VICTIM** and bearing Facebook user ID **100055326781270 (Target Facebook Account)**, that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Special Agent with the ICE-Homeland Security Investigations (HSI) and have been since 2001. As such, I am an investigative agent or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered by law to conduct investigations of or to make arrests for offenses enumerated in Title 18, United States Code, Section 2516 (7).

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3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, Sections 1591(a)(1) (sex trafficking of children), 1594(c) (conspiracy to sex traffic children), and 2251(a) (production of child pornography) will be located on the **Target Facebook Account**. There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. See 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States (including a magistrate judge of such a court) that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i); see also *United States v. Bansal*, 663 F.3d 634, 662 (3d Cir. 2011) (rejecting the contention that Rule 41(b)’s limits trump 18 U.S.C. § 2703(a)); *United States v. Berkos*, 543 F.3d 392, 397-98 (7th Cir. 2008) (holding that Rule 41(b) “does not apply to § 2703(a)”; *United States v. Scully*, 108 F. Supp. 3d 59, 83 (E.D.N.Y. 2015) (“[Section] 2307(a) authorizes electronic search warrants by a federal magistrate judge that extend outside his or her district . . . the plain terms of Section 2703, considered with Rule 41, dictate this result.”).

BACKGROUND RELATED TO FACEBOOK AND RELEVANT TECHNOLOGY

6. Based on my training and experience, I know the following to be true as it relates to the requested search of the **Target Facebook Account**:

- a. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the public.
- b. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.
- c. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which

highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

- d. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.
- e. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.
- f. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo

or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

- g. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.
- h. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.
- i. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.
- j. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

- k. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.
- l. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.
- m. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.
- n. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile and would show when and from what IP address the user did so.
- o. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service

(including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

- p. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users

access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

7. Therefore, Facebook is likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

PROBABLE CAUSE

8. April 30, 2021, the Hardeeville Police Department (HPD) began an investigation involving a juvenile (JUVENILE VICTIM) possibly being the victim of human trafficking in Hardeeville, South Carolina. Information regarding the JUVENILE VICTIM was provided to

HPD by the Chatham Division of Family and Children Services in Savannah, GA and Memorial University Children's Hospital in Savannah, GA. Memorial University Children's Hospital had treated the JUVENILE VICTIM for a medical condition and while being treated, the JUVENILE VICTIM made statements to the staff that she was being forced to engage in commercial sex, which hospital staff reported to the human trafficking hotline.

9. Specifically, it was reported the JUVENILE VICTIM was possibly being sexually trafficked by two men who were present at the hospital with her, that the JUVENILE VICTIM was addicted to crack cocaine, involved in prostitution, and living out of Room 260 at the Days Inn, located in Hardeeville, South Carolina. Hospital staff identified the two men who were present at the hospital with the JUVENILE VICTIM to be CEDERICK RILEY (RILEY) and EARL CALDWELL (CALDWELL). The JUVENILE VICTIM told hospital staff she was having sex with up to fifteen men a day in exchange for money and drugs.

10. Based on the information provided to HPD regarding the JUVENILE VICTIM, HPD obtained a search warrant on May 7, 2021, for room 260 at the Days Inn, which was registered to RILEY, to search for the JUVENILE VICTIM, as well as evidence of prostitution and drug distribution. During surveillance prior to execution of the search warrant, officers observed RILEY and a female matching the description of the JUVENILE VICTIM coming in and out of room 260. A short time later, officers observed a young female, somewhat matching the description of the JUVENILE VICTIM, leave the Days Inn with an individual known to local law enforcement as Travis HAUPT (HAUPT). However, because officers could not see the face of the young female, they could not confirm the young female was the JUVENILE VICTIM. Unable to confirm the JUVENILE VICTIM had left the Days Inn, officers executed the search warrant on room 260.

11. During the execution of the search warrant, officers located RILEY inside the room with several other people. The JUVENILE VICTIM was not located. A Smith & Wesson pistol, cell phone, scale and various narcotics were located inside the room. RILEY admitted he knew the JUVENILE VICTIM but denied knowing where she was. RILEY was arrested on local charges and booked into the Jasper County Detention Center.

12. After not locating the JUVENILE VICTIM in room 260 at the Days Inn, HSI and SLED located and interviewed HAUPT. HAUPT confirmed the young female he left the Days Inn with was the JUVENILE VICTIM and he had driven her to the Red Roof Inn, located in Yemassee, South Carolina, where she was staying in room 122. Law enforcement responded to room 122 at the Red Roof Inn in Yemassee, located the JUVENILE VICTIM and safely turned her over to the care of the South Carolina Department of Social Services.

13. During further investigation, officers confirmed room 122 at the Red Roof Inn was also registered to RILEY. A review of security video of the back entrance of the Red Roof Inn showed the JUVENILE VICTIM with a black male and white male, later identified by the JUVENILE VICTIM as RILEY and CALDWELL, a day or two prior to her being placed in the care of the South Carolina Department of Social Services on May 7, 2021.¹

14. During the investigation, the cellphones of both the JUVENILE VICTIM and RILEY were seized as evidence and state search warrants were obtained to extract the contents.

¹ The JUVENILE VICTIM told officers she had been staying at the Red Roof Inn since May 5, 2021. Employees of the Red Roof Inn advised law enforcement the hotel had lost power a few days prior to May 7, 2021, which had caused the date and time stamp on the security footage to be inaccurate. From viewing the footage, law enforcement believed the date stamp to be off by two days, however, because of the power outage, the exact date and time could not be determined.

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15. During interviews with law enforcement, RILEY stated he met the JUVENILE VICTIM when she was hanging out with his cousin. The JUVENILE VICTIM's mother had left her in the Bluffton, SC area when she moved back up north, and the JUVENILE VICTIM was using illegal drugs. RILEY took the JUVENILE VICTIM in, and they began a relationship. The JUVENILE VICTIM was already involved in prostitution when RILEY met her. RILEY met "Jess" through the JUVENILE VICTIM, and he met CALDWELL through "Jess".

16. Based on information known to law enforcement, as well as photographs, social media and other electronic communications found on the JUVENILE VICTIM's phone, "Jess" has been identified as JESSICA MILLS (MILLS).

17. HSI used the cellphone number XXX-XXX-7761 for the JUVENILE VICTIM provided by the human trafficking tip line to search commercial sex ads on Spotlight.² A search of the number yielded sixty-two (62) commercial sex ads posted between November 7, 2020, and March 1, 2021, in various locations throughout South Carolina and once in Georgia. The ads had various images of a female, which the JUVENILE VICTIM confirmed were her in later forensic interviews, posing in lingerie. One ad on January 8, 2021, stated "I use protection 25/8 rates: Quick visit (20 minutes), 150 half an hour, 200 an hour." The ad provided the location as Charleston and North Charleston, SC and the same number XXX-XXX-7761 identified as the JUVENILE VICTIM's for prospective clients to call.

18. During forensic interviews of the JUVENILE VICTIM, she stated at age sixteen (16) she got involved with a twenty-five-year-old (25) named "Tyler" and that "Tyler" introduced her to heroin. During their relationship, "Tyler" took her to a "crack house" where

² Spotlight is web-based application which captures and stores commercial sex ads for law enforcement to use in sex trafficking investigations.



she met MILLS, who was around twenty-nine (29) years old at the time. The JUVENILE VICTIM stated MILLS is the one who introduced her to “crack” and commercial sex and that MILLS eventually had the JUVENILE VICTIM using crack every day. The JUVENILE VICTIM stated she made \$1,000 the first night she participated in commercial sex with MILLS. The JUVENILE VICTIM advised MILLS controlled the pricing and posted their ads on “Skip the Games”. MILLS advertised their names as “Red and Blue” because the JUVENILE VICTIM had red hair and MILLS had blue hair. The JUVENILE VICTIM stated most of the time MILLS would get the money and not give the JUVENILE VICTIM any because the JUVENILE VICTIM was afraid she would spend it.

19. Regarding RILEY, the JUVENILE VICTIM stated she met RILEY while she and MILLS were living at a house with a male named “Jason” LNU. When she met RILEY, MILLS had left the JUVENILE VICTIM at the house for a week by herself and the JUVENILE VICTIM was using a lot of drugs. RILEY got the JUVENILE VICTIM and MILLS a hotel room at Econo-Lodge, which she and MILLS used to engage in commercial sex. The JUVENILE VICTIM and RILEY began a romantic relationship; however, RILEY was verbally abusive, putting her down and calling her hurtful names. The JUVENILE VICTIM further explained RILEY did not have to work and benefitted financially from her prostitution.

20. As to CALDWELL, the JUVENILE VICTIM stated she met Caldwell shortly after her seventeenth (17) birthday through MILLS and that MILLS and CALDWELL would buy their drugs from RILEY. CALDWELL used to be MILLS’ “Sugar Daddy”, but they had a “falling out”. After CALDWELL and MILLS’ “falling out”, CALDWELL contacted the JUVENILE VICTIM through “Skip the Games”, and they began a commercial sex relationship. CALDWELL would meet with the JUVENILE VICTIM almost daily and she would usually just

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perform oral sex on him. CALDWELL would give the JUVENILE VICTIM cash, provide her drugs, pay off her drug debts and occasionally pay for the JUVENILE VICTIM and RILEY's hotel rooms.

21. A review of the JUVENILE VICTIM'S phone extraction revealed that between September 2020 and May 2021, the JUVENILE VICTIM communicated through the **Target Facebook Account** with approximately forty-three (43) people, to include CALDWELL, RILEY, and MILLS. There were one-hundred and sixty-eight (168) messages with CALDWELL, forty-three (43) messages with MILLS, and ten (10) messages with RILEY. The messages with CALDWELL come from an account with the username "Chuck Ashley". During the interviews of JUVENILE VICTIM and RILEY, they stated they knew CALDWELL as "Chuck Ashley". Below are some of those Facebook Messenger communications showing the **Target Facebook Account** was used to communicate with CALDWELL, MILLS and RILEY.

April 29-May 7, 2021

Facebook Messenger conversation between the JUVENILE VICTIM and CALDWELL/"Chuck Ashley". This Message string was obtained from the JUVENILE VICTIM's phone.

From: 100024569800693 Chuck Ashley
 Timestamp: **5/1/2021** 11:01:14 PM(UTC-4)
 Source App: Facebook Messenger
 Body: Did you get it

From: 100055326781270 Juvenile Victim
 Timestamp: **5/2/2021** 12:56:10 AM(UTC-4)
 Source App: Facebook Messenger
 Body: So Sorry hun I was packing and cleaning ! So much cleaning

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 8:29:23 AM(UTC-4)
Source App: Facebook Messenger
Body: I'll be free later.

From: 100055326781270 Juvenile Victim
Timestamp: **5/2/2021** 12:03:40 PM(UTC-4)
Source App: Facebook Messenger
Body: Just woke up sorry. Been sleep for hours

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 6:18:15 PM(UTC-4)
Source App: Facebook Messenger
Body: Obviously you didn't mean to video call me. Maybe you don't even know. Nice tho.

From: 100055326781270 Juvenile Victim
Timestamp: **5/2/2021** 7:00:07 PM(UTC-4)
Source App: Facebook Messenger
Body: None of my call history says I called you at all

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 7:18:12 PM(UTC-4)
Source App: Facebook Messenger
Body: Wyd?

From: 100055326781270 Juvenile Victim
Timestamp: **5/2/2021** 7:18:18 PM(UTC-4)
Source App: Facebook Messenger
Body: Nun hbu

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 7:19:13 PM(UTC-4)
Source App: Facebook Messenger
Body: I'm on the rd.

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 8:06:06 PM(UTC-4)
Source App: Facebook Messenger
Body: You are avoiding all my questions.

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 8:06:51 PM(UTC-4)
Source App: Facebook Messenger
Body: Usually means you don't want to tell me.

From: 100024569800693 Chuck Ashley
Timestamp: **5/2/2021** 8:36:36 PM(UTC-4)
Source App: Facebook Messenger
Body: I'll just ask. Have you been with Jeff?

From: 100055326781270 Juvenile Victim
Timestamp: **5/2/2021** 9:46:50 PM(UTC-4)
Source App: Facebook Messenger
Body: Lmao so are hacking my stuff again?

From: 100024569800693 Chuck Ashley
Timestamp: **5/3/2021** 11:49:10 PM(UTC-4)
Source App: Facebook Messenger
Body: When you need apartment let me know.

From: 100024569800693 Chuck Ashley

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Timestamp: **5/4/2021** 1:24:21 PM(UTC-4)

Source App: Facebook Messenger

Body: Make good choices

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 4:23:12 AM(UTC-4)

Source App: Facebook Messenger

Body: Thank you

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 1:20:55 PM(UTC-4)

Source App: Facebook Messenger

Body: Wya

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 1:22:17 PM(UTC-4)

Source App: Facebook Messenger

Body: What's going on?

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 1:22:32 PM(UTC-4)

Source App: Facebook Messenger

Body: Nun you said we could get together today

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 1:23:23 PM(UTC-4)

Source App: Facebook Messenger

Body: ?

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 1:24:19 PM(UTC-4)

Source App: Facebook Messenger

Body: What was situation

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 1:26:23 PM(UTC-4)

Source App: Facebook Messenger

Body: What do you mean ? Everything is fine here. So are we gonna get together or what? I bought a ball and lost THE WHOLE THING. I'm so pissed right now

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 1:31:19 PM(UTC-4)

Source App: Facebook Messenger

Body: Shower and head your way

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 1:31:57 PM(UTC-4)

Source App: Facebook Messenger

Body: Was it delivered?

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 2:13:25 PM(UTC-4)

Source App: Facebook Messenger

Body: I'll stop Edie's on way in.

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 3:50:43 PM(UTC-4)

Source App: Facebook Messenger

Body: Don't know what u have in mind. Get a room?

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 3:53:02 PM(UTC-4)



Source App: Facebook Messenger

Body: Yes. Maybe come back with me and go boat ride and see dolphins too.

From: 100024569800693 Chuck Ashley

Timestamp: **5/5/2021** 4:03:41 PM(UTC-4)

Source App: Facebook Messenger

Body: Please wear something like yesterday

From: 100055326781270 Juvenile Victim

Timestamp: **5/5/2021** 4:03:59 PM(UTC-4)

Source App: Facebook Messenger

Body: Okay

From: 100024569800693 Chuck Ashley

Timestamp: **5/6/2021** 5:09:13 PM(UTC-4)

Source App: Facebook Messenger

Body: Come on, I've always been there to help if you need it. Last night and this morning alone was \$1175. Edie 325, \$400 cash, \$75 room and \$375 room for week.

22. Not recovered during the above communications on those dates are multiple audio calls between CALDWELL and JUVENILE VICTIM. Within the extraction of JUVENILE VICTIM's phone search warrant is a file labeled "Audio". Those are audio calls recovered from the phone contents. Below during the conversation between JUVENILE VICTIM and CALDWELL, there were three "Audio CALLS". The content was not recovered from the extraction. An "Audio Call" is a "voice message" sent during the written communication on Facebook Messenger.

From: 100055326781270 JUVENILE VICTIM

Timestamp: 5/5/2021 3:47:15 PM(UTC-4)

Source App: Facebook Messenger

Body: Audio Call

6 secs

From: 100055326781270 JUVENILE VICTIM

Timestamp: 5/5/2021 4:13:30 PM(UTC-4)

Source App: Facebook Messenger

Body: Audio Call

1 min

From: 100055326781270 JUVENILE VICTIM

Timestamp: 5/7/2021 7:45:51 PM(UTC-4)

Source App: Facebook Messenger

Body: Audio Call

42 secs

April 18, 2021

Facebook Messenger conversation containing ten (10) messages between the JUVENILE VICTIM and Cedrealg (Cederick) RILEY. This Message string was obtained from the JUVENILE VICTIM's phone.

From: 100055326781270 JUVENILE VICTIM

Timestamp: 4/18/2021 1:07:59 PM(UTC-4)

Source App: Facebook Messenger

Body: CEDRICK

From: 100055326781270 JUVENILE VICTIM

Timestamp: 4/18/2021 1:08:01PM(UTC-4)

Source App: Facebook Messenger

Body: OMG

From: 100041435823036 Cedrealg Riley

Timestamp: 4/18/2021 1:29:16 PM(UTC-4)

Source App: Facebook Messenger

Body: So where the f*** you at and what you got going on you can message me but you can't answer your phone

From: 100041435823036 Cedrealg Riley

Timestamp: 4/18/2021 2:55:30 PM(UTC-4)

Source App: Facebook Messenger

Body: Dumbass just text me and say I'm good it's a lot going on and you playing stupid

April 24-May 4, 2021

Facebook Messenger conversation containing forty-three (43) messages between the JUVENILE VICTIM and Jessica MILLS. This Message string was obtained from the JUVENILE VICTIM's phone. At the start of the conversation the name "Monty" is discussed. Through the course of the investigation and information obtained from state law enforcement, Monty is a local suspected drug dealer in Jasper County. Not recovered from the conversation were two (2) audio calls and (3) images.

From: 100055326781270 JUVENILE VICTIM

Timestamp: 4/24/2021 11:22:50 AM(UTC-4)

Source App: Facebook Messenger

Body: Yo

From: 100055326781270 JUVENILE VICTIM

Timestamp: 4/24/2021 11:22:57 AM(UTC-4)

Source App: Facebook Messenger

Body: We can go to Monty

From: 100030604328646 Jessica MILLS

Timestamp: 4/24/2021 12:05:20 PM(UTC-4)

Source App: Facebook Messenger

Body: Don't go see

From: 100055326781270 JUVENILE VICTIM
Timestamp: 4/24/2021 12:18:24 PM(UTC-4)
Source App: Facebook Messenger
Body: 7 secs "audio call" (NOT RECOVERED)

From: 100055326781270 JUVENILE VICTIM
Timestamp: 5/01/2021 11:59:35 AM(UTC-4)
Source App: Facebook Messenger
Body: 11 secs "audio call" (NOT RECOVERED)

From: 100055326781270 JUVENILE VICTIM
Timestamp: 5/01/2021 11:59:35 AM(UTC-4)
Source App: Facebook Messenger
Body: 11 secs "video call" (NOT RECOVERED)

From: 100030604328646 Jessica MILLS
Timestamp: 05/04/2021 6:21:52 AM(UTC-4)
Source App: Facebook Messenger
Body: img/png (NOT RECOVERED)

From: 100030604328646 Jessica MILLS
Timestamp: 05/04/2021 1:24:40 PM(UTC-4)
Source App: Facebook Messenger
Body: img/png (NOT RECOVERED)

From: 100055326781270 JUVENILE VICTIM
Timestamp: 5/01/2021 1:33:17 PM(UTC-4)
Source App: Facebook Messenger
Body: Suicide and other drugs
img/png (NOT RECOVERED)

23. On October 13, 2021, a Federal Grand Jury in Charleston, South Carolina issued a superseding indictment in United States v. Riley, et al., charging the CALDWELL, MILLS, and RILEY with conspiracy to traffic a minor for sex (18 U.S.C. § 1594(c)) and trafficking a minor for sex (18 U.S.C. § 1591(a)(1)), and charged CALDWELL with three additional counts of production of child pornography (18 U.S.C. § 2251(a)).³

24. A preservation letter was submitted to Facebook in May of 2021 for the **Target Facebook Account** after the JUVENILE VICTIM was placed in protective custody. I have no reason to believe any evidence has been deleted from the **Target Facebook Account** since the preservation letter was submitted. As of June 15, 2022, the **Target Facebook Account** is still active.

25. Based on my training and experience, and all the information contained herein, I believe the information set forth in Attachment B to this affidavit is relevant to the ongoing investigation into MILLS, CALDWELL, RILEY and their violations of Title 18, United States Code, Sections 1591(a)(1), 1594(c), 2251(a), and could provide further evidence of those violations, such as additional audio files, video files, images and other text communications showing MILLS, CALDWELL, and RILEY's involvement in the sexual exploitation of the JUVENILE VICTIM. The information included in Attachment B could also provide additional context to the **Target Facebook Account** communications previously extracted from the JUVENILE VICTIM's cellphone as well as provide the images and recordings that were not

³ The original indictment charged Riley only for felon in possession of a firearm as a result of the search warrant executed on the Days Inn on May 7, 2021.

recovered and establish the physical location of the JUVENILE VICTIM when pertinent messages were sent from the **Target Facebook Account**.

AUTHORIZATION REQUESTS

26. Based on the foregoing, I request that the Court issue the proposed search warrant.

27. I further request that the Court direct Facebook to disclose to the government any information described in Attachment B that is within its possession, custody, or control. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Facebook. Because the warrant will be served on Facebook, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

This affidavit has been reviewed by SAUSA Carra Henderson.

Respectfully submitted,



Kenneth D Hawsey
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me on June 15, 2022



MARY GORDON BAKER
UNITED STATES MAGISTRATE JUDGE